

From: [Kennedy, Aisha](#)
To: [Adams, Darla](#)
Cc: [Schofield, John](#)
Subject: Respond by 2/17/17 - Request for Information - Rho-Chem EPA RCRA Inspection Follow up
Date: Monday, January 30, 2017 2:22:16 PM

Darla,

Thank you for your September 26, September 30, and November 4, 2016 follow-up responses to EPA's 3007(a) Request for Information received by Rho-Chem on February 24, 2016 and EPA's follow-up e-mail sent on September 6, 2016. In reviewing the information submitted by Rho-Chem to date, EPA Region 9 has some additional questions and clarifications. Please respond to the items below by Friday, February 17, 2017.

1. In Rho-Chem's September 26, 2016 response to EPA's September 6, 2016 follow-up information request question 1.d., the facility stated that "Rho-Chem management initially estimated 228 document packages but has since noted that many bins were individually manifested which decreases the number of document packages."
 - a. What does the term "individually manifested" mean?
 - b. If "individually manifested" packages were not included in prior manifest packages, please provide EPA with copies of the manifests and any operating record information that can support what each of the macroencapsulated and microencapsulated shipments contained.
2.
 - a. Please confirm that in manifest packages where the Waste Process Form indicates that the incoming load(s) consisted of one hundred percent (100%) of the outgoing load, no additional waste materials were added to the outgoing loads (e.g., 000159696MWI, 000160089MWI, 000137260MWI).
 - b. If additional materials were added to these off-site waste shipments, please provide operating record information used to identify the source(s) and composition of the wastes added to the outgoing shipments.
3. During EPA's September 21-25, 2015 compliance evaluation inspection, Rho-Chem provided EPA with a copy of the facility's macroencapsulation Standard Operating Procedures (SOPs) (reference Stericycle SOP-0056 dated April 23, 2015; U. S. Ecology Nevada SOP: OPS-010, revised November 19, 2012). EPA also requests copies of the microencapsulation related SOPs the facility had in place at the time of EPA's inspection.
4. EPA Region 9 has asked several questions in its 3007(a) letter concerning the facility's air pollution control system including the "knock-out pots" (see Questions 10, 11, 12 and 13 in EPA's original Request for Information letter). EPA is requesting copies of the most recent tank certifications dated prior to the time of EPA's September 21-25, 2015 inspection for each of the two knock-out pots observed at the facility (reference 22 CCR 66265, Article 10).

Unavailability of Records. If you are unable to respond to an item in a detailed and complete manner, or if you are unable to provide any of the information requested, indicate the reason for

your inability to do so. If a record(s) responsive to a request is not in your possession, custody, or control and you have reason to believe that another person may be able to provide it, state the reasons for your belief and provide the person's name, address, telephone number, and any information available (i.e., author, date, or subject matter) about the record(s).

Please do not hesitate to contact me if you have any questions concerning the above.

Regards,

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